



**Wisconsin
Right to Life, Inc.**

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FEDERAL ELECTION
COMMISSION #418 ROOM

Nov 23 1 09 PM '98

November 16, 1998

Richard Ng
Federal Election Commission
Washington, DC 20463

Dear Mr. Ng,

This letter is in response to your letter dated November 10, 1998 where you ask us to make some adjustments in our report based on your analysis. You also ask whether our connected organization (corporation) made election expenditures. The following explanations, along with attachments, address the items in your letter.

1. Our Connected Organization, Wisconsin Right to Life PAC, did not, nor has it ever, made illegal election expenditures. The expenditures to which you refer (see attachments) are payments the Wisconsin Right to Life PAC made to Wisconsin Right to Life, Inc. to rent Wisconsin Right to Life Inc's mailing list. Election law forbids Wisconsin Right to Life, Inc. from making any contributions for election activities. In our organization, the mailing list belongs to Wisconsin Right to Life, Inc. In order for the Wisconsin Right to Life PAC to use this list for election activities, the Wisconsin Right to Life PAC must rent the list from Wisconsin Right to Life, Inc. at fair market value. The Wisconsin Right to Life PAC expenditures you noted reflect the payments (in installments) the PAC made to the Wisconsin Right to Life, Inc. to rent the list.

If Wisconsin Right to Life, Inc. simply gave the list to the Wisconsin Right to Life PAC, then it would be clearly illegal because Wisconsin Right to Life, Inc. would be giving something of value to the Wisconsin Right to Life PAC. Wisconsin Right to Life, Inc. and Wisconsin Right to Life PAC, however, have been diligent in making sure all transactions are in compliance with election law.

The Wisconsin Right to Life PAC has been renting the mailing list from Wisconsin Right to Life, Inc. in exactly the same way for years. The FEC and the State Elections Board (when we are dealing with state candidates) have always recognized this transaction as legal, as well they should.